UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION

NO. 21 MC 101 (AKH)

This document related to
Bavis v. United Airlines, Inc., et al.
02 Civ. 7154 (AKH)

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JAN 25 2011

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jonathan Ross, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: Edwin W. Green

Firm Name: ED GREEN ATTORNEY AT LAW

Address: P.O. Box 74
0266 Gold Nugget Drive
Breckenridge Colorado 80424

Phone Number: (212) 661-4200 and 1-888-406-0806

Fax Number: (212) 661-4813

Email Address: ed.green@la-taupe.net

FILED
U.S. DISTRICT COURT
2011 JAN 25 AM 11:03
S.D. OF N.Y.

Edwin W. Green is a member in good standing of the Bar of the State of California, the United States District Court for the Northern District of California, the United States District Court for the Central District of California, the United States District Court for the Eastern District of

CERTIFICATE OF SERVICE

I, Jonathan J. Ross, an attorney with the firm of Susman Godfrey L.L.P., attorneys for Defendant Huntleigh USA Corporation, certify:

I am over eighteen (18) years of age. On this 24th day of January, 2011, I caused to be served by email the MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT ATTORNEY PRO HAC VICE, AND PROPOSED ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION on the parties on the following service list:

1. Donald A. Migliori, Esq., Joseph F. Rice, Esq. and Mary F. Schiavo, Esq. – *Wrongful Death and Personal Injury Plaintiffs' Liaison Counsel and Plaintiff's Counsel*;
2. Desmond T. Barry, Esq. and Victoria Turchetti, Esq. – *Aviation Defendants Liaison Counsel*;
3. Robert A. Clifford, Esq. and Timothy T. Tomasik, Esq. – *Property Damage and Business Loss Plaintiffs' Liaison Counsel*;
4. Beth Jacob, Esq. – *WTC 7 Ground Defendants' Liaison Counsel*;
5. Richard Williamson, Esq. and Jason T. Cohen, Esq. - *WTCP Counsel*;
6. Katherine L. Pringle, Esq. – *WTC 7 Ground Defendants' Liaison Counsel*; and
7. Jeannette Vargas, Esq. and Alicia M. Simmons, Esq. – *United States Attorneys' Office*.

Jonathan J. Ross

1422830v1/012371

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AFFIDAVIT IN SUPPORT OF MOTION
TO ADMIT ATTORNEY PRO HAC VICE

State of New York :
: ss.
County of New York :

JONATHAN ROSS, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Susman Godfrey, L.L.P. and am counsel for Defendant Huntleigh USA Corporation in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Huntleigh USA Corporation's motion to admit Edwin W. Green as counsel *pro hac vice* to represent Defendant Huntleigh USA Corporation in this matter.

2. I am a member in good standing of the bars of the States of New York and Texas, and was admitted to practice law in 1993 and 1994, respectively. I am also admitted to, and am in good standing in the United States District Court for the Southern District of Texas (3/24/95), the Northern District of Texas (9/19/03), the Eastern District of Texas, the Eastern District of Arkansas (08/11/04), the Western District of Arkansas (08/11/04), the Northern District of

Georgia (2004), the Eastern District of NY (2/8/07), the Southern District of NY (2/6/07), the United States Court of Appeals for the Federal Circuit (12/01/99), the United States Court of Appeals for the Second Circuit (02/05/02), the US Court of Appeals for 5th Circuit (2/23/05), and the United States Supreme Court (10/6/03).

3. I have known Edwin W. Green since about March 2008.

4. Mr. Green is a solo practitioner and a litigation management consultant admitted to practice law in the State of California. I attach an Affirmation from Mr. Green in Support of the Notice of Motion to Admit Counsel *Pro Hac Vice* as Exhibit 1.

5. I have found Mr. Green to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move for the admission of Edwin Green, *pro hac vice*. I attach Certificates of Good Standing from the State Bar of California and from the United States District Courts for the Northern, Central and Eastern Districts of California, as Exhibit 2.

7. I respectfully submit a proposed order granting the admission of Edwin Green, *pro hac vice*, which is attached hereto as Exhibit 3.

WHEREFORE, it is respectfully requested that the motion to admit Edwin Green, *pro hac vice*, to represent Defendant Huntleigh USA Corporation in the captioned matter, be granted.

Jonathan J. Ross

Sworn to before me this
24th day of January 2011

Virginia H. Lewis
Notary Public, The State of Texas

VIRGINIA H. LEWIS
Notary Public, State of Texas
Commission Expires 08-17-2014

1422830v1/012371

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 LITIGATION

MARY BAVIS,

Plaintiff,

-against-

UAL CORPORATION et al.,

Defendants.

AFFIRMATION OF
EDWIN GREEN

21 MC 101 (AKH)

02 Civ. 7154

EDWIN W. GREEN solemnly affirms and says:

1. I am a solo practitioner of the firm Ed Green Attorney at Law. My business address is P.O. Box 74, 0266 Gold Nugget Drive, Breckenridge, Colorado 80424. My business telephone numbers are (212) 661-4200 and 1-888-406-0806.

2. I was admitted to practice law in the State of California on June 14, 1960. I am also admitted to practice law in the District Courts for the Central, Northern and Eastern Districts of California. I am admitted to practice law in the Ninth Circuit Court of Appeals and the Supreme Court of the United States.

3. I am, and always have been, a member in good standing of all Courts to which I have been admitted.

4. A recent Certificate of Good Standing from the State of California and Certificates of Good Standing from the federal courts to which I am admitted are attached as Exhibit 2 to the Affidavit of Jonathan Ross, Esq.

5. I have become familiar with the standards of professional conduct imposed upon members of the New York Bar and the Bar of the Southern District of New York and relevant statutes, rules, and procedures, and I will abide by them.

6. Having spoken with my client on this matter, I represent to the Court that my client has full confidence in my legal abilities and wishes for me to participate as its counsel in this proceeding.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 10, 2011
New York, New York

EDWIN W. GREEN, ESQ.

THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

January 10, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, EDWIN W. GREEN #30508 was admitted to the practice of law in this state by the Supreme Court of California on June 14, 1960; that from the date of admission to December 31, 2009, he was an ACTIVE member of the State Bar of California; that on December 31, 2009, he transferred at his request to the INACTIVE status; that from that date to March 15, 2010 , he was an INACTIVE member of the State Bar of California; that on March 15, 2010 , he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

Certificate of Good Standing

United States of District Court)
) ss.
Northern District of California)

I, Richard W. Wieking, Clerk of the United States District Court for the Northern District of California, do hereby certify that **Edwin W. Green, Bar No. 30508** was duly admitted to practice in said Court on **December 28, 1964**, and is in good standing as a member of the bar of said Court.

Dated at San Francisco on January 12, 2011

Richard W. Wieking
Clerk

United States District Court

Central District of California

CERTIFICATE OF GOOD STANDING

I, TERRY NAFISI, Clerk of this Court, certify that

Edwin W, Green Bar Number 30508

duly admitted to practice in this Court on June 14, 1970

and is in good standing as a member of the Bar of this Court.

Dated at Los Angeles, California

on January 12, 2011
DATE

TERRY NAFISI
District Court Executive, Clerk of Court

By [signature]
Linda Rayford, Deputy Clerk

AO 136 (Rev. 9/98) Certificate of Good Standing

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CERTIFICATE OF GOOD STANDING

I, Victoria C. Minor, Clerk of this Court,

certify that ***Edwin W. Green*** *, Bar #* ***30508****,*

was duly admitted to practice in this Court on

06/07/1990 *, and is in good standing*

as a member of the Bar of this Court.

Dated at 1/19/2011 .

Victoria C. Minor

Victoria C. Minor, Clerk of Court

UNITED STATES DISTRICT COURTd
SOUTHERN DISTRICT OF NEW YORK

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ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Jonathan J. Ross, attorney for Defendant Huntleigh USA Corporation, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Edwin W. Green

Firm Name: ED GREEN ATTORNEY AT LAW

Address: PO Box 74
0266 Gold Nugget Drive
Breckenridge Colorado 80424

Phone Number: (212) 661-4200 and 1-888-406-0806
Fax Number: (212) 661-4813
Email Address: ed.green@la-taupe.net

Is admitted to practice *pro hac vice* as counsel for Huntleigh USA Corporation in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: ____________________, 2011.
New York, NY

____
United States District/Magistrate Judge